

DuPont Chestnut Run
Corrective Action Evaluation
May 26, 2006 Site Visit Notes by Diane Schott

Participants:

DuPont:

Isidoros Zankos - DuPont Environmental
Mike Liberati - DuPont Environmental
Bradley A. Berg - Chestnut Run Environmental Engineer
Rick Drasech - Chestnut Run Environmental Engineer
Matt Brill - DuPont Environmental Contractor

DNREC:

Bryan Ashby
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EPA:

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Background Discussion:

Reviewed DuPont presentation - "Welcome to Chestnut Run Plaza, Agenda for 5/26/06 Meeting...."

DuPont identified the following building and chemical use:

Preliminary evaluation of use of C-8: Not used

Building 702 : currently used for offices, packaging, labeling, and printing.

Building 705: leased to ARC of Delaware

Building 708: currently used for office space, customer product testing, and
electronic clean rooms
some space is or was leased to COE

Permit status:

Permitted area (storage pad) was clean closed effective 9/2/04.

Surface Water –

Three surface water streams flow through the site. One stream is immediately east of the site and flows by the general waste management area located by the southeastern portion of the facility. Another stream flows below ground on the

western portion of the facility, just east of Building 711E and emerges to the surface south of the facility property. A third water stream flows past the Power House AST and into a pond located between Buildings 708 and 709, and then appears to flow below ground.

DuPont confirmed that water for the facility is provided by the City of Wilmington.

EPA agreed to look into the site rank –

The site is a low priority RCRA corrective action facility.

EPA expressed concern that the current evaluation focuses on post RCRA waste management, and the corrective action program was created to address pre-RCRA waste management. DuPont stated waste has not been disposed on site.

EPA inquired about a Former Settling Pond (page II-2 of RFA) and a Sedimentation Pond (DERS 4/15/96 letter, page 5). DuPont indicated the ponds are a storm water pond.

EPA agreed to provide copies of pictures taken during the RFA. Electronic copies of the picture pages have been prepared.

Site Visit:

Information referred to during site visit:

DuPont Chestnut Run Figure (June 24, 2005) - Identifies SWMU locations

Spring 2006 SWMU Photo Log ("Photo Log")
prepared by Matt Brill during week prior to visit.

Summary of Old (1991) and New (To May, 2006) Solid Waste Management Units

1991 RFA SWMU descriptions/photos

New Information presented by representatives of DuPont:

Facility generated 70,000 pounds of waste in 2005.

An employee knowledgeable about historical waste management is "Daniel Amigo" (spelling?).

Weather During Site Visit:

Rain - varying in intensity - began during inspection of the SWMUs by Building 714 and continued through the end of the inspection.

Inspection Results (in approximate order of inspection):

Building 702:

SWMU 29: "90 Day Area" -Identified in Photo Log-

Info from DuPont:

DuPont SWMU summary indicates site is active and subject to DNREC compliance inspections.

EPA Observations:

No documentation of and do not recall observing.

DuPont photo depicts a brick storage area with evidence of base deterioration.

Further evaluation of SWMU 29 is necessary to evaluate evidence of release.

SWMU 3: Nonhazardous Waste Storage Area

Info from DuPont: Closed

Storage area removed in 2001 .

Roof, fence, and former boiler unit have been removed.

EPA Observations:

No visual evidence of release.

Building 711E:

SWMU 33: Storage Area - Identified in Photo Log

Info from DuPont:

Built after 1991 -determined through reviewing dated figures.

Waste flammables, hazardous wastes, and non-hazwastes are stored in area.

Releases, if they occurred, "would have been pumped out".

DNREC Information:

SWMU is among locations included in occasional inspections by DNREC.

EPA Observations:

Floor contains a grate over a concrete sub-floor .

No visual evidence of release.

SWMU 20: (Former) Carbon Black Dust Collection Unit/(Current Teflon Dust Collection Unit)

Info from DuPont:

Initial unit closed.

Current unit collects Teflon dust

EPA Observation:

No visual evidence of release.

SWMU 8: (Former) 90 Day Hazardous Waste Accumulation Area

Info from DuPont: Closed

Location is currently an electrical substation inside and a bag house outside.

Wall has been moved out to extend interior space

Floor has been replaced

EPA Observation:

No visual evidence of release.

SWMU 9: Building 711E Crawlspace/Oil Leak

EPA Observations:

Significant dripping is apparent.

Black oily substance appears present over a several square yard area of unsealed concrete

DuPont photo log photo presents an area that is not the drip area.

SWMU 18: Sawdust Collection System

EPA Observation:

No visual evidence of release.

SWMU 7: (Former) Hazardous Waste Accumulation Area

Info from DuPont: Closed

Unit was an outside storage location primarily used to dispense flammable liquids.

Unit contained an accumulation drainage area that was inspected weekly.

Rainwater blew into area and filled accumulation sump.

Sump has been filled with concrete and accumulation area has been removed.

Accumulation (likely rainwater) was pumped out before sump was filled with concrete.

No evidence of contamination was observed when the area was refurbished.

No known releases in 40 years.

EPA observation:

No visual evidence of release.

Building 712

SWMU 10: (Former) 90 Day Hazardous Waste Accumulation Area

Info from DuPont: Closed

Current used is for storage of raw materials and possibly polymer disposal.

Floor drain was capped.

Floor drain formerly drained to pipes below area.

Pipes drained to containers that were placed below area.

Drums stored in the area do not contain accumulated waste.

Area below SWMU 10 is a “confined space entry”

EPA Observations:

Concrete base inside storage area is clean.

Storage area contains a former drain that drained to pipes below area.

No visual evidence of release inside of SWMU 10 or at accessible area outside of SWMU 10.

SWMU 15: Polyester Resin Cooling dock and Refuse Dumpster

EPA Observation:

No visual evidence of release.

Building 713

SWMU 18: Former Saw Dust Collection System

Info from DuPont: Closed

EPA Observation:

Unit has been removed.

SWMU 11: Non-Hazardous Waste Oil Storage Area

Info from DuPont:

Building was built in 1955

EPA Observations:

Located on a concrete dock.

Current storage area is constructed with corrugated metal walls that appear in good – possibly new condition.

Metal walls contain a gap between the bottom of the wall and the concrete base (dock) - such that any liquid or storm water drainage could flow off of dock and onto adjacent soil.

No visual evidence of release.



EPA Photo #1- SWMU 11 Metal Sides over Dock

SWMU 21: Process Polymer Waste Dumpsters

EPA Observations:

Dumpsters present in photo log were not present during inspection.

No visual evidence of release.

Building 714

SWMU 34: 90 Day Storage Area - Identified in Photo Log

Info from DuPont:

Area opened since RCRA Part B Pad was closed.

EPA Observations:

Drums and storage containment pad appear in excellent - possibly new-condition.

Black stain is present on concrete below storage containment pad.

Stain appeared surficial.

EPA Photo # 2: SWMU 34 Stain on Concrete



SWMU 12: (Former) Nonhazardous Waste Storage Area

Information from DuPont: Closed.

Storage area is no longer used.

EPA Observations:

No recollection of observation or notes from observation.

In DuPont photo, area appears to be surrounded with areas of dead grass.

Building 715

SWMU 13: 90 Day Hazardous Waste Accumulation Area

Information from DuPont:

Area reconstructed approx. 2001

Area was a larger room

Original floor remains

Used to store water based materials

Building operations began 1961

DNREC Information:

Area included in occasional inspections by DNREC.

EPA Observations:

Shelving on floor obstructs visual inspection

Concrete appears to be in good condition and clean

Observations were limited to area not obstructed by new wall and area not obstructed by shelving.

For observed area, no visual evidence of release.

Southeast Corner Property Area

Includes SWMU 1, 16, 22, 23, & 24 Area and SWMU 2 Area

SWMU 1, 16, 22, 23, & 24 Area

SWMU 1: (Former) RCRA Permitted Hazardous Waste Storage Pad

SWMU 16: Non-Hazardous Waste Storage Area

SWMU 22: Scrap Metal Storage Area

SWMU 23: Scrap Metal Dumpster

SWMU 24: Blue Roll Off used for Storing Asbestos

Info from DuPont:

SWMU 1: Closed

Constructed as Part B Pad in 1984

DNREC approved clean closure 9/2/04.

SWMU 23: Closed

EPA Observations of SWMU 1, 16, 22, 23, & 24 Area

Entire area appeared to be an older storage area, parts of which were updated to conform to RCRA requirements.

Older surface areas and possible pre-RCRA conditions did not appear sufficient to contain a release.

Area is adjacent to a creek

Drain is located between SWMU 1 and creek.

No visual evidence of release.

EPA Photos #3, #4, #5 and #6: Southeast Corner Property Area



EPA Photo #3: SWMU 16 and Surrounding Area



EPA Photo #4: SWMU 1 - Former Hazardous Waste Storage Area



EPA Photo #5: SWMU 22 - Scrap Metal Storage Area



EPA Photo #6: SWMU 22 - Scrap Metal Storage Area

SWMU 2: RCRA Interim Status Hazardous Waste Storage Area

Info from DuPont: Closed

Former asphalt area now may be covered with grass and concrete.

Use began in 1980

DNREC approved closure 1/25/93.

EPA Observations:

Creek is located behind area.

No visual evidence of release.

Building 717

SWMU 17: Satellite Accumulation Area

Info from DuPont:

Inspected informally at least weekly – (during walk by's)

DuPont summary indicates area is closed

EPA Observation:

Area appeared to be operating.

No visual evidence of release.

SWMU 18 - Former Sawdust Collection System

Info from DuPont: Closed

Unit has been removed.

EPA Observation:

No visual evidence of release.

Building 708

SWMU 4: 90-Day Hazardous Waste Accumulation Area

Info from DuPont :Closed

Unit has been removed.

EPA Observations:

Observed during a downpour.

Location is flat with drainage to adjacent parking and soil areas.

No visual evidence of release.



EPA Photo #7 SWMU 4 - Flat Location



EPA Photo #8 SWMU 4 - Drainage

SWMU 19: Satellite Accumulation Area

Info from DuPont: Closed

Area was gutted and renovated in late 1990's.

Current area generally is a "limited access clean room".

Photo not provided.

EPA Observations:

Not inspected.

SWMU 30: 90-Day area inside Building 708

Info from DuPont:

Photo provided.

EPA Observations of Photograph:

DuPont photo and description indicate area is limited to a metal shelving area covered with yellow tape.

Floor in photo is not clear.

Of area observable in DuPont photo, no visual evidence of release.

Outside of Powerhouse – SWMU 14 and 35 Area

SWMU 14: Underground Pipes from Fuel Oil AST going into Powerhouse.

SWMU 35: Location of Old AST

Info from DuPont:

Release from SWMU 14/35 Area addressed via a removal overseen by DNREC

Soil samples were collected

– No release below clay occurred

Outside of Powerhouse, SWMUs14 and 35, Info from DuPont continued:

DuPont provided DNREC letters dated November 22, 2006 and April 17, 2006, addressing No Further Action for the Aboveground Storage Tank (AST) Trenching and the AST, respectively.

DNREC contact is "Trip Fisher"

Pipes and 250 gallon tank were replaced last year

EPA Observations:

Area was minimally observed while passing through location during a downpour.

No visual evidence of release was apparent.

Building 709 Area - Rain deterred detailed evaluation of area.

SMWU 27 - Aluminum Can/Plastic Bottle Recycling Bins

Info from DuPont: Closed

Recycling dumpsters have been removed.

EPA Observations:

Location not inspected.

SWMU 6: Test Equipment Storage Pad

Info from DuPont: Closed

-Former Waste Ethyl Acetate Storage Pad

-Used one time in 1985 to repackage drums.

EPA Observations:

-Location not inspected due to down pour.

-In DuPont photo, area appears as a flat stained concrete area surrounded by a soil area with medium to poor grass growth.

-Further evaluation of SWMU 6 area is necessary to assess whether a release occurred.

SWMU 5: 90 Day Hazardous Waste Accumulation Area

EPA Observations:

Location observed during downpour.

Location is a loading dock.

No visual evidence of release was apparent.

SWMU 31: 90 Day Hazardous Waste Accumulation Area

SWMU 32: 90 Day Hazardous Waste Accumulation Area

Info from DuPont:

SWMUs were identified in DuPont's Summary of Old and New SWMUs.

SWMUs 31 and 32 are subject to DNREC compliance inspections.

EPA Observation of SWMUs 31 and 32:

Locations were not inspected.

In DuPont photos, SWMUs appear as yellow metal storage cabinets placed on tile (SWMU 31) and concrete (SWMU 32).

No visual evidence of release was apparent in the DuPont photos.

Building 701

SWMU 28: 90-Day Hazardous Waste Accumulation Area

Info from DuPont:

SWMU was identified in DuPont's summary of Old and New SWMUs.

SWMU is subject to DNREC compliance inspections.

SWMU 28 Continued.

EPA Observations:

Location was not inspected.

In DuPont photo, area appears as a covered concrete dock containing drums and shelving.

In DuPont photo, metal staining is apparent on dock wall.

Further evaluation of SWMU 28 is necessary to evaluate evidence of release.

General Facility Wide Conclusions

Release was observed below Building 711E.

For evaluated areas, other than the observed release below Building 711E, no visual evidence of release was apparent.

Evaluation focused on observable current releases.

Evaluation missed some inspectable areas and did not address non-observable releases or pre-RCRA waste management.

General Recommendations

1. Oil Drips

- a. For oil drips below Building 711E, evaluate preventing the drips.
- b. For Building 711E area where drips are occurring, evaluate the extent of release and the need for a remedy &/or improved containment.
- c. Evaluate entire Chestnut Run facility for similar machinery drips.

2. General Evaluation

Evaluate SWMUs 6, 12, 28, and 29 for evidence of release.

3. Pre-RCRA Evaluation

Evaluate waste management practices and spills prior to RCRA, and potential for impact to surface water streams and groundwater.

EPA Photo Log for May 26, 2006 DuPont Chestnut Run Site Inspection

Date imprint on photographs incorrectly states 02/06/2004.

EPA Photo #1: SWMU 11 - Staining on Side of Dock

EPA Photo #2: SWMU 34 - Stain on Concrete

EPA Photo #3: SWMU 16 and Surrounding Area

EPA Photo #4: SWMU 1 - Former Hazardous Waste Storage Area

EPA Photo #5: SWMU 22 - Scrap Metal Storage Area

EPA Photo #6: SWMU 22 - Scrap Metal Storage Area

EPA Photo #7: SWMU 4 - Flat Location

EPA Photo #8: SWMU 4 - Drainage